

May 31, 2023

Via ECF

Hon. Analisa Torres
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: United States v. Yanping Wang, S1 1:23-cr-00118-AT

Dear Hon. Judge Torres:

Along with ChaudhryLaw PLLC, we represent Ms. Yanping Wang in the above-referenced matter. On May 5, 2023, the Court permitted Ms. Wang to file her motion to revoke Magistrate Lehrburger's detention order two weeks after we received from Pretrial Services certain information related to Ms. Wang's interview on the day of her arrest. Pretrial Services provided that information on May 22, 2023. Ms. Wang's due date to file her motion to revoke the detention order is, therefore, next Monday, June 5, 2023.

Pursuant to Rule III. D. of the Court's Individual Practices, we write to seek permission to file a Memorandum of Law of up to forty pages in support of Ms. Wang's motion to revoke. The additional pages are necessary in order to set out in full relevant detail the history of the bail

litigation in this case, the full relevant factual background, as well as to address the relevant aspects of Judge Lehrburger's decision.

Respectfully submitted,

Lipman Law PLLC

A handwritten signature in black ink, appearing to read 'Alex Lipman', with a long horizontal flourish extending to the right.

Alex Lipman

Cc: AUSA Juliana N. Murray
AUSA Micah Fergenson
AUSA Ryan Finkel